

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, ET AL.

PLAINTIFFS

VS.

NO. 17-CV-05089-TLB

KATHY O'KELLY, ET AL.

DEFENDANTS

ORAL DEPOSITION

OF

DERICK DILLARD

TAKEN MAY 25, 2021, AT 9:03 A.M.

Bushman Court Reporting

A P P E A R A N C E S

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1 and he was one of those.

2 Q Did y'all also recruit financial supporters?

3 A No.

4 Q How did you pay the bill to go to Nepal?

5 A I had a salary.

6 Q I see.

7 A I had other healthcare and benefits.

8 Q Benefits. Okay. From what organization did you receive
9 this salary and benefits?

10 A The International Mission Board.

11 Q Of the Southern Baptist Convention?

12 A Yes, sir.

13 Q Okay. And just full disclosure, my parents were
14 missionaries of the IMB at one point.

15 A Okay.

16 Q I don't believe they were ever in Nepal, but...
17 How long were you a missionary with the IMB?

18 A Two years.

19 Q What years were those, if you recall?

20 A 2012, 2013, up until the beginning of 2014.

21 Q Okay. And would that have been directly after your
22 graduation from Oklahoma State?

23 A Shortly thereafter.

24 Q Okay. Within a few months?

25 A Less than a year. I'm not sure exactly.

1 Q Any jobs between your graduation from Oklahoma State and
2 your job with the IMB?

3 A Yes. I was working at a bank while I was finishing up the
4 process to go with the IMB.

5 Q What bank?

6 A I believe at the time it was Liberty Bank.

7 Q They've been bought up by somebody, haven't they?

8 A I think so.

9 Q Do you know who?

10 A I think Centennial Bank, but I could be wrong.

11 Q Sure. Liberty Bank, what branch were you at?

12 A In Rogers.

13 Q Okay. Were you a teller or something else?

14 A Just a teller at that time.

15 Q Sure. And then when you came back from the mission field
16 with the IMB, you took the job at Walmart headquarters as an
17 accountant?

18 A Correct.

19 Q Okay. How long did you do that job?

20 A I believe until a couple months after our son was born.

21 Q In 20 --

22 A It was July 2015.

23 Q Okay. And where did you go from Walmart?

24 A To Central America.

25 Q As a missionary again?

1 A Yes, sir.

2 Q Was this also through the IMB?

3 A No, sir.

4 Q Who -- who were you affiliated with to South America in
5 2015?

6 A Central America. SOS Ministries.

7 Q I'm sorry.

8 A No worries.

9 Q What was the ministry name?

10 A SOS Ministries.

11 Q Okay. Are they affiliated with a particular denomination?

12 A Not that I'm aware of.

13 Q Okay. But you did receive a salary with them?

14 A No. We -- no, I did not.

15 Q You raised your own support?

16 A Yes.

17 Q Okay. And how long -- what Central American country did
18 you go to?

19 A El Salvador, Honduras, Guatemala.

20 Q Okay. And how long did you do that?

21 A We were with them about two years.

22 Q Okay. You said "we" and I assume your -- your wife and
23 son went along with you, correct?

24 A Correct.

25 Q Okay. And so, that would have been 2015 and 2016, right?

1 A Yes, until -- this would have been summer of 2015 until
2 summer of 2017.

3 Q Okay. What did you do after that?

4 A Started working with our church.

5 Q And what position -- you're talking about Cross Church,
6 correct?

7 A Cross Church.

8 Q What did you do with Cross Church?

9 A I was a resident minister in admissions department.

10 Q Okay. Before which you received a salary, correct?

11 A There was a small monthly stipend.

12 Q Okay. And have you remained in that job until now?

13 A No, sir.

14 Q Okay. How long did that job last with Cross Church?

15 A Until I started law school.

16 Q And when was that?

17 A Fall of 2018.

18 Q Okay. And since you've been in law school, you've been a
19 full-time law student, I assume.

20 A Correct.

21 Q Is that right? Okay. And you told us about your
22 clerkship since then. Do you have a job offer now that you
23 graduated law school?

24 A Not right now.

25 Q Okay. All right. So, let me go back. Tell me -- well,

1 questions.

2 Q Okay. Do you recall anybody talking to you and taking
3 notes while they were talking to you?

4 A Possibly. I don't recall exactly.

5 Q Okay. So, we talked a little bit about your educational
6 background and your employment history. We talked about -- I
7 asked you about your history with the television show. My
8 understanding is that there have been two television shows: 19
9 *Kids and Counting* and then later on, a show called *Counting On*.
10 Have you ever been employed by TLC or anybody else in relation
11 to either of those shows?

12 A No, sir.

13 Q Have you ever been paid by TLC or anyone else in relation
14 to your appearance on either of those shows?

15 A Yes.

16 Q How does that work if you're not employed?

17 A After -- I asked if we could get paid when I found out
18 some things and they said there was an agreement that we be
19 paid.

20 Q So, I believe you have appeared on both of the shows,
21 correct?

22 A Correct.

23 Q And the transition from one show to the other occurred
24 shortly after this disclosure, correct, that we're talking
25 about here in 2015?

1 A Correct.

2 Q Okay. Were you paid for any of your appearances on the
3 show -- on the old show, *19 Kids and Counting*?

4 A No.

5 Q Did you ever inquire about why you weren't being paid for
6 your appearance on that show?

7 A I guess this is kind of an open-ended question. So, it
8 gets into a lot of -- have I ever inquired?

9 Q Yes.

10 A Yes.

11 Q Who have you inquired about on that score?

12 A Jim Bob Duggar.

13 Q What did you ask Jim Bob Duggar about why you hadn't been
14 paid for your appearances on *19 Kids and Counting*, the old
15 show?

16 A You're asking why?

17 Q What -- what did you ask -- what did you ask him?

18 A I told him that the -- that what he had paid previously
19 was inaccurate from what he said.

20 MS. DOUGHTY: Just -- sorry to interrupt,
21 but should this be designated no longer
22 attorneys' eyes only?

23 MR. BLEDSOE: We're going to deal with that
24 later because -- you know, we're not going to do
25 it on a question-by-question basis.

1 Q All right, Mr. Dillard. I think we had left -- when we
2 left, I had asked you about your compensation from the TLC
3 television shows related to the Duggard family. I think you
4 had told me that you began receiving per episode pay of \$500 to
5 \$1,000 sometime in 2017, but that it ended at some point. When
6 did that end?

7 A I believe it was in May of 2017.

8 Q Oh, okay. So, when did it start?

9 A Sometime early 2017.

10 Q So, you just received this pay for a few months?

11 A Correct.

12 Q Why did it end?

13 A Because we left the show.

14 Q Who is "we"?

15 A My family.

16 Q You and Jill, right? And your kids?

17 A Correct.

18 Q Okay. Why did you leave the show?

19 A Is Steve still on here? I'm just wondering.

20 Q Steve.

21 A Steve Bledsoe. Oh, sorry.

22 Q He is.

23 MR. OWENS: You're muted, Steve.

24 MR. BLEDSOE: Yes. I'm still here. I
25 didn't want you to watch me eating.

1 A Yes.

2 Q Do you think you've been more or less active on social
3 media since you left the show?

4 A About the same.

5 Q Do you think you've been more or less introverted since
6 you left the show?

7 A About the same.

8 Q Okay. Do you think Jim Bob and Michelle Duggar and TLC
9 have treated you and your family right in relation to the
10 television shows?

11 MR. BLEDSOE: Vague and ambiguous,
12 unintelligible.

13 Q Go ahead.

14 A Which -- in what way? What do you mean?

15 Q I'm sorry. What?

16 A Are you speaking TLC or Jill Duggar's family?

17 Q All right. Let's separate them. Has TLC treated you and
18 your family right with respect to the TV shows?

19 MR. BLEDSOE: Vague and ambiguous,
20 unintelligible, overbroad.

21 A I don't know exactly what you mean, but I think they're
22 unaware of -- I've never interacted with them on a professional
23 level not having a contract, so.

24 Q Okay. Have Jim Bob and Michelle Duggar treated you right
25 with respect to the TV shows?

1 MR. BLEDSOE: Vague, ambiguous,
2 unintelligible.

3 A I'm not sure, because I think there are a lot of
4 misunderstandings there.

5 Q What are the misunderstandings that you see?

6 A Where I thought there should have been -- I thought we
7 should have known and been able to decide whether or not we
8 made an obligation to the show.

9 Q And you feel like they failed in that regard?

10 MR. BLEDSOE: Misstates testimony, vague,
11 ambiguous.

12 A Intentionally or unintentionally, I don't know.

13 Q Okay. You said that you were paid -- for a few months,
14 anyway, paid \$500 to \$1,000 per episode. Any idea what Jim Bob
15 and Michelle Duggar were making?

16 A At what time? With what? I'm confused.

17 Q So, in those same -- in those same months where you were
18 being paid \$500 to \$1,000 an episode, what -- how were Jim Bob
19 Duggar and Michelle Duggar being compensated?

20 A I don't know exactly right off the top of my head right
21 now.

22 Q Okay. More than that?

23 A Yes.

24 Q A lot more than that?

25 MR. BLEDSOE: Vague, ambiguous.

1 A Define "a lot."

2 Q So, were they receiving more than \$10,000 an episode?

3 MR. BLEDSOE: It's foundation, speculation.

4 A I don't know exactly, but probably, yes.

5 Q Okay. You said you were paid \$500 to \$1,000 an episode
6 for a few months in 2017. What was Jill paid for her
7 involvement in the television shows?

8 A Somewhere around the same, but more than me.

9 Q Okay.

10 A I don't know if it was 1,000 or -- or what.

11 Q Somewhere in that same neighborhood, but it was a per
12 episode payment, right?

13 A Correct.

14 Q Do you know whether either or both of you were paid as W-2
15 employees or 1099 and contractors?

16 A I'd have to look at my tax statement and see.

17 Q Sure. Any other benefits associated with your involvement
18 in the TV show other than salary?

19 A Sometimes. If we went grocery shopping, they would cover
20 our grocery bill.

21 Q Okay.

22 A For example.

23 Q Yeah. No, I got you. Has Jill ever told you why her
24 parents didn't procure counseling for her after she was
25 molested?

1 A We're both involved, but because I'm so busy right now she
2 does a lot of it.

3 Q Okay. And what's the theme, I guess, of that channel?
4 What are y'all trying or hoping to do with that channel?

5 A Just sharing different things about life. Gardening was
6 the most recent one, I think.

7 Q Okay. But it's -- it's an attempt to connect with your
8 fans with a glimpse into your -- your life; is that fair?

9 A I wouldn't say we're trying to connect with anyone. We're
10 just trying to share fun videos.

11 Q Why -- why did y'all start that channel?

12 A We just thought it would be fun to do. It helps generate
13 some income.

14 Q Oh, I see. Okay. About how much do y'all make on that
15 channel?

16 A I don't know. I think last month was \$800.

17 Q Okay. And is that sort of a -- a per view payment or
18 something? How does that work?

19 A I'm not sure exactly. I know there's different options
20 for YouTube and it's based off of ads to my understanding.

21 Q I see. Okay. So, if -- if you and Jill felt like your
22 privacy was invaded in 2015, why have you expanded your
23 presence on these public social media channels?

24 MR. BLEDSOE: That's a misleading question.

25 It's vague and ambiguous, argumentative.

1 A I can't recall right now anything.

2 Q Okay. Anything that you've argued about more than once?

3 A I'm sure there has, but I can't recall.

4 Q Okay. How'd you get the idea to do a YouTube channel?

5 A I honestly don't remember, but it was -- we -- you know,

6 we wanted to have some control. It helps you have control.

7 Q Okay. Y'all attend church most weeks, right?

8 A Right.

9 Q What -- how would you label or describe your faith and the
10 role of your faith in your life?

11 A It's the most important thing to me.

12 Q You are a Protestant Christian, correct?

13 A Right.

14 Q Are y'all affiliated with any particular denomination?

15 A Our church is Southern Baptist.

16 Q Okay. Cross Church, yes?

17 A Correct.

18 Q Okay. Do you personally ascribe to the Baptist faith and
19 message?

20 A At the time that I affirmed it. I don't know if it's
21 changed, but I affirmed it when I went with this -- with the
22 Southern Baptist Convention.

23 Q Okay. How do you and Jill view the role of the Bible in
24 the daily life of the believer?

25 A It's very important.

1 Q So, just like -- I know you've studied in law school about
2 various interpretive methodologies. How do you go about
3 interpreting the Bible?

4 A We believe the Holy Spirit indwells a Christian and as you
5 read the Bible, the Holy Spirit speaks to you and reveals to
6 you truth. The Bible is 100 percent truth and I seek it daily.

7 Q You believe the Bible to be God-inspired and inerrant?

8 A Yes.

9 Q Do you seek to apply it to your daily life?

10 A Yes.

11 Q What do you make of Paul's exhortation in his epistles not
12 to sue fellow brothers and sisters in Christ?

13 A I think there's a process to go through.

14 Q Okay. What process is that? Are you referring to the
15 process in Matthew, Chapter 18?

16 A Yes.

17 Q Have you or has Jill, to your knowledge, gone through that
18 process with any of the defendants in this lawsuit?

19 A I don't know.

20 Q Okay. Did you ever hear anything about someone writing
21 down an account of Josh's molestations of one or more of his
22 sisters and putting that in a book that was later found by
23 someone?

24 A I'm sorry. I'm getting the feedback again. I don't know
25 if that's from the same as earlier.

1 she did on the old show?

2 A I don't remember actually.

3 Q Okay. Was her -- was her compensation increased for the
4 new show?

5 A I'm sorry?

6 Q Was Jill's compensation increased for the new show?

7 A Increased from what?

8 Q From what she'd been paid on the old show?

9 A No. Well, she wasn't paid on the old show, so anything
10 would be an increase.

11 COURT REPORTER: I'm sorry. Mr. Dillard,
12 can you speak up just a little bit for me?

13 THE WITNESS: Yes, I'm sorry.

14 COURT REPORTER: Thank you.

15 Q Your understanding was Jill wasn't paid on the old show.
16 Was anybody paid on the old show?

17 A I don't know who was paid on the old show.

18 Q Have you or any members of the family, to your knowledge,
19 discussed filing any kind of wage and hour lawsuit against TLC
20 for not paying people for working?

21 A I'm sorry. Can you repeat that again?

22 Q Sure. Have you or has anyone associated with the family
23 to your knowledge discussed filing suit against TLC or anybody
24 else for not paying them for working?

25 A No. I'm getting the feedback again.

1 A No.

2 Q Okay. Since the press reports in 2015 of Josh's
3 molestation of his sisters, has anyone come to you and said
4 that they knew about it before the press reports?

5 A No.

6 Q Anything that you've read in the press reports of 2015
7 regarding Joshua's molestation of sisters that was untrue, to
8 your knowledge?

9 A I don't remember what all I read.

10 Q Okay. Has Jill, to your understanding, forgiven Josh?

11 A To my understanding, yes.

12 Q Has she explained her thought process in so doing to you?

13 A Has she told me that she's forgiven him?

14 Q Yeah. Why she's forgiving him, I guess.

15 A Because that's the right thing to do.

16 Q Okay. Why is it the right thing to do?

17 A I assume that she's forgiven him because it's consistent
18 with her faith.

19 Q Based on your faith, when is it appropriate to forgive and
20 when is it appropriate not to forgive?

21 A I think it's always appropriate to forgive.

22 Q Then why this lawsuit?

23 MR. BLEDSOE: You know, Derick, you don't
24 have to answer that question. That's a
25 nonsensical, stupid question. It's

1 MR. BLEDSOE: Calls for a legal conclusion,
2 vague, ambiguous.

3 A It would seem so.

4 Q Okay. Part of her forgiveness of Josh is that she's
5 chosen not to sue him for those events.

6 A I don't know what -- what's the reasoning for that.

7 Q Okay.

8 MR. OWENS: Why don't we take a lunch
9 break? I see we're at one o'clock now. Why
10 don't we take a lunch break now? I'll try to
11 look at my notes. Hopefully I'm running close.

12 MR. BLEDSOE: Okay. Fine with me.

13 MR. OWENS: You want to reconvene in 30
14 minutes? Is that okay.

15 MR. BLEDSOE: That's fine with me.

16 THE WITNESS: That works with me.

17 MS. DOUGHTY: Could we maybe do 45 minutes?
18 Would that be all right?

19 MR. OWENS: That would be perfect, 1:45
20 Central.

21 MS. DOUGHTY: Thank you.

22 MR. BLEDSOE: Thank you.

23 MR. OWENS: Thank y'all.

24 (Recess taken)

25 Q All right, Mr. Dillard. We're back on the record. Where

1 stressors in you and Jill's life. I just want to go through a
2 couple of those. What knowledge do you have about Jim Bob
3 being controlling? What -- can you give examples of that?

4 MR. BLEDSOE: Compound, argumentative,
5 assumes facts, vague and ambiguous, eventually
6 calls for a narrative.

7 A For example, as I had mentioned before, they were
8 pressuring us to come back to do a photo shoot or anything else
9 that we were -- such as that.

10 Q Okay. Have you ever experienced or have knowledge of him
11 yelling at Jill or any of the girls?

12 A I'm sorry. You cut out there at the beginning of the
13 question. Can you repeat the question, please?

14 Q Sure. Do you have any knowledge about Jim Bob yelling at
15 any of the girls?

16 A No.

17 Q Has Jill ever told you that her dad has yelled at her?

18 A I don't think so.

19 Q At this point, is you and Jill's relationship with the
20 family -- would you describe it as strained?

21 A Who's the family?

22 Q The Duggars, Jim Bob, Michelle -- Jim Bob -- let's just
23 say Jim Bob and Michelle.

24 A Yes.

25 Q What -- would you describe their relationship as strained

1 A No.

2 Q What about the last two years?

3 A No.

4 Q Same question for how often she speaks to her. Has that
5 changed in the last year?

6 A How often she speaks with her?

7 Q Yes.

8 A No.

9 Q What about in the last two years?

10 A No.

11 Q And something you said about not wanting to go over to the
12 house. You said you -- I think you said you don't see eye to
13 eye about a few things. What were those things?

14 A Like separate from what I was talking about earlier?

15 Q Well, you said it's awkward and you don't see eye to eye
16 on things. I'm wondering what it is that you don't see eye to
17 eye on?

18 A About, like, for another reason she has a nose ring.

19 Q Okay. And Jim Bob and Michelle don't approve of that, or
20 what is the issue?

21 A Yes, correct.

22 Q Are there any other parts of you or Jill's lifestyle that
23 they don't approve of?

24 A I think so.

25 Q What are those?

1 A The -- like, she started wearing pants.

2 Q Is there anything else?

3 A Drinking just occasionally.

4 Q Is that it?

5 A That I can recall right now, yeah.

6 Q Okay. Prior to Jim Bob requesting or telling you and Jill
7 not to come to the house without permission, what was the
8 arrangement like? Could you guys just go over whenever you
9 wanted, or how -- what was that? What did that look like?

10 A We would generally go over for holidays and other events
11 that might be going on.

12 Q Do you know -- or, let me back up. Sorry. Back up. Was
13 there anybody that you were in contact with at TLC?

14 A At any point?

15 Q Yes.

16 A I'm not sure. I can't remember.

17 Q Well, do you think you were in contact with someone? You
18 just can't remember their name?

19 A Potentially, and yes.

20 Q Would you have been in contact with them via email or
21 phone?

22 A Email and maybe phone.

23 Q Do you have access to those emails?

24 A Maybe.

25 Q Well, if you do, I would like for you to get them to your

1 Q So, why did you ask me with who?

2 A I was just wondering.

3 Q Okay. Does Jill have an NDA with anybody?

4 A Not that I'm aware of.

5 Q Would you be aware if your wife had an NDA with someone?

6 A I don't know.

7 Q Is it possible -- so, it's possible she has an NDA, you
8 just don't know?

9 A Possible, not probable.

10 Q Has anybody ever approached you about an NDA for you?

11 A No.

12 Q Has anyone ever approached Jill?

13 A I don't know.

14 Q Do you know if anybody in the Duggar family has an NDA?

15 A I don't know. No, I don't.

16 Q As we've discussed, you are -- well, you just finished law
17 school. Did you -- and you did clerkships during law school,
18 but other than that, did you have like a full-time job?

19 A Full-time while in law school?

20 Q Mm-hm.

21 A In addition to clerking?

22 Q Mm-hm.

23 A No.

24 Q Okay. So, if you were -- you weren't working and Jill
25 doesn't -- isn't working, what was the sources of income for

1 the house during the last three years of you being in law
2 school?

3 A Part-time work. Multiple part-time jobs.

4 Q And who -- who was working those?

5 A Me.

6 Q What were you doing?

7 A I was delivery driver for Grubhub.

8 Q Okay. Anything else?

9 A Like I said before, we had a YouTube channel, generated
10 some income.

11 Q And remind me how much you made monthly on that?

12 A I believe last month was around \$800.

13 Q Is that about -- is that typical?

14 A Yeah, I'd say so.

15 Q About \$800 -- I'm sorry.

16 A Sure. Yeah. It varies, so. Sometimes it's zero,
17 sometimes it's 800.

18 Q Okay. How much do you think you made in a month working
19 for Grubhub?

20 A Again, it would just depend on the month.

21 Q Can you just give me an average?

22 A Again, as much as -- close -- up to as much as 800 or more
23 a month.

24 Q With just Grubhub?

25 A Yes.

1 Q And so, are those the only two sources of income?

2 A We have savings.

3 Q Anything else?

4 A Jill's done a couple of -- or a handful of advertisements.

5 Q Do you know for what companies?

6 A Most recently there's a modest swim-wear company called
7 Modlily.

8 Q Any idea how much she earned by participating in that
9 advertisement?

10 A I want to say somewhere around a couple thousand dollars.

11 Q Around so would you say 2,000? Is that what you mean?

12 A Somewhere around there, yes. I'm not sure exactly the
13 number.

14 Q I understand. Anything -- any other advertisements you
15 can think of?

16 A We did one for Butcher Box.

17 Q So, were these just one time things, or does she get --
18 you guys get paid like each time someone clicks on something?
19 How does that work?

20 A Someone emailed us and asked, do you want to do some stuff
21 and work with us? We can choose to do that or not do that.

22 Q Who emailed you?

23 A I think it was a lady named Vicki.

24 Q Do you know her last name?

25 A It's like -- I really don't know how to pronounce it --

1 but I think it's like Djuboutiabourn (phonetic), something like
2 that.

3 Q Okay. Are those emails something that you can access?

4 A Yes.

5 Q Okay. I would ask that you preserve those and I will
6 either ask for them in production or you can give them to your
7 attorney and he can provide them to us.

8 A Okay.

9 Q Okay. So, back to the -- so, the modest swim-wear --
10 swim-wear and Butcher Box, any other advertisements?

11 A There's a cereal company called Magic Spoon.

12 Q Okay. Any others?

13 A Not that I can recall right now.

14 Q So, with those advertisements, those relationships, is the
15 way that you all get paid -- is it just a one -- like, a lump-
16 sum payment for appearing in it, or do you guys get -- I guess,

17 and/or do you get money or paid by traffic? Like, when someone
18 clicks on it and goes to the website and buys? Does that make
19 sense?

20 A Just the once.

21 Q Okay. So, you don't get paid more by directing more
22 traffic to their website?

23 A No.

24 Q Like a click -- okay.

25 A Oh, there's one other one I thought of.

1 Q Okay.

2 A Just because as I remembered -- I want to be as accurate
3 as I can. FabFitFun.

4 Q What is that?

5 A It's a box with a bunch of stuff in it.

6 Q Like a monthly box subscription?

7 A Yes.

8 Q Okay. So, besides those advertisements -- and has those
9 all happened within the last year or have they been spread out?

10 A That's comprehensive. That's all the ones I can remember
11 ever.

12 Q Okay. So, besides those things, what income are you --
13 what's the sources of income? How do you -- how do you pay
14 your mortgage and car payments, et cetera, your monthly bills?

15 A Through the sources I just said and clerkships and my
16 part-time job and some savings.

17 Q So, you don't -- do you guys receive any assistance from
18 family members or people outside of you and Jill? I mean, does
19 anybody else assist you with your monthly bills?

20 A My -- like -- not for our monthly bills, no.

21 Q Okay. Is there anybody that assists you guys financially?

22 A Like birthday money?

23 Q Not gifts. I would say just someone that assists you with
24 -- assists you financially not counting gifts -- birthday
25 gifts, Christmas, not money you get in your Christmas card or

1 your birthday card.

2 A Okay. Our neighbors bring boxes of food sometimes.

3 Q Okay.

4 A And I also got food through the pantry on campus.

5 Q Okay. Is this your neighbors in Lowell?

6 A Yes, our next door neighbors.

7 Q What are their names?

8 A Mike and Monica.

9 Q Do you know their last name?

10 A Jimenez.

11 Q So, is that all the assistance -- financial assistance you
12 can -- that you receive?

13 A That I can think of right now, yes.

14 Q Okay.

15 A And the food pantry on campus. I don't know if I
16 mentioned that.

17 Q Thank you. So, as far as you and Jill's dynamic, how
18 would you describe your partnership? Is it equal? Is it, you
19 know, you're the head of the household? Can you -- can you
20 tell me about that?

21 A Our partnership with each other?

22 Q Yes.

23 A I mean, we're -- I mean, on our taxes I'm the head of our
24 household.

25 Q Right. I mean, more like day-to-day dynamics. Are you

1 the decision maker, the authority, or is it 50/50 decision-
2 making?

3 A I mean, we're like -- we're each other's best friends so
4 we just talk about any concerns we have, and we make joint
5 decisions.

6 Q I appreciate that. But can you tell me does your -- does
7 your faith dictate how your -- the dynamic between your partner
8 and you?

9 A Yes.

10 Q Can you tell me about that?

11 A Yes, I believe in Ephesians. The Scripture calls me to
12 love my wife, so I loved her, and that's the way I try to
13 relate to her.

14 Q Okay. Is there anything in your faith that says that
15 you're supposed to be the head of the household as far as
16 decision-making?

17 A I don't think in those -- I mean, not in those words.
18 Like, it says wife submit to your husbands, so. But I can't
19 think of anything where I would ask my wife to submit to me.

20 Q Okay. If Jill wanted to work outside of the home, would
21 you be okay with that?

22 A Yes.

23 Q So, I want to talk about some of your social media posts.
24 I reviewed a few of them and I'm just going to -- I'm going to
25 summarize them and if I summarize them incorrectly, please tell

1 me.

2 But I recall reading some posts about repression and threats
3 from other family members. Can you tell me what you meant by
4 that?

5 A Can you read -- what post are you referring to?

6 Q These were on your -- on your Twitter.

7 MR. BLEDSOE: Assumes facts not in
8 evidence.

9 A I don't know what you're referring to.

10 Q Okay. Do you recall posting things about receiving
11 threats from family members?

12 A I'm sorry. You're just cutting out a little bit. What
13 was that?

14 Q Do you recall making any posts on any social media
15 platform about being repressed or receiving threats from other
16 family members?

17 A No.

18 Q Have you been threatened by any of the -- any other family
19 members?

20 A Possibly.

21 Q Can you tell me about that?

22 A When we were told to come back for a photo shoot, Jim Bob
23 Duggar said, you know, well, you know, you might be sued or
24 something. So, maybe not a threat from him directly, but, you
25 know, he's suggesting that somebody else is going to sue you.

1 Q Is that the only example that you have?

2 A I can't recall right now.

3 Q After your -- your most recent -- I would say your most
4 recent social media activity has been, I think we said
5 controversial earlier; is that a fair statement?

6 A Controversial to whose standards, or what are we talking
7 about?

8 Q To the Duggars.

9 A Which post are you talking about?

10 Q Well, when you're talking about Josh, about standing up
11 for what's right, those sorts of things?

12 A I don't --

13 MR. BLEDSOE: Vague and ambiguous,
14 compound.

15 Q I'm sorry. What was your answer?

16 A I don't recall ever posting about Josh.

17 Q You may not -- okay. We can come back to the texts.
18 (Indiscernible) -- get those two confused with that.

19 So, you and Jill go to Cross Church. Do the other Duggar
20 family members that live locally, do they all go to the same
21 church or do they go to different churches?

22 A I don't know.

23 Q Have you ever gone to the church that Jim Bob and Michelle
24 go to?

25 A I don't know what church they go to.

1 A I don't have an opinion one way or the other.

2 Q Okay. What is your relationship with Anna like?

3 MR. BLEDSOE: Vague and ambiguous.

4 A She's my wife's brother's wife.

5 Q Do you and Jill see her?

6 A Like at all?

7 Q Mm-hm. Yes.

8 A Like do -- do we see her, like, or have we seen her? I
9 don't understand.

10 Q When was the last time that you saw Anna in person?

11 A Last month.

12 Q And where was that?

13 A At a wedding.

14 Q Is this before Josh got arrested or after?

15 A I believe before.

16 Q Have you seen Anna since Josh was arrested?

17 A No.

18 Q Earlier we were talking about forgiveness and that
19 process. Is it part of your faith to confess when you've done
20 something wrong?

21 A To whom?

22 Q To anyone.

23 A I believe it's important to confess your sins to God.

24 Q Does that mean in private, like in prayer, private prayer,
25 or in a public, like, in church more than to, like the

1 congregation??

2 A It just depends, I guess.

3 Q What does it depend on?

4 A It depends on most everything.

5 Q Can you explain that to me?

6 A It depends on the context.

7 Q Do you have any knowledge of Josh confessing any sins that
8 he had about to --

9 A To -- to what? I'm sorry. You broke up.

10 Q To his church.

11 A No, I'm not aware of any.

12 Q Have you ever heard anybody talk about that?

13 A Have I heard anybody talk about what?

14 Q About Josh confessing some -- any of his sins to the
15 church congregation?

16 A No, I have not.

17 Q Do you have any knowledge of Jim Bob being aware that the
18 reports were going to be released prior to them actually being
19 released?

20 A I don't remember.

21 Q You don't remember or you don't know?

22 A What's the diff -- what do you mean?

23 Q I mean, do you have any knowledge that Jim Bob was aware
24 of -- that the police reports were going to be released prior
25 to their actual release?

1 A Generally not.

2 Q Does that mean you have at some point?

3 A I don't like making definite statements, so I can't say we
4 never have, but not that I can recall.

5 Q Is there -- who in your home handles the finances? In
6 that -- meaning, who pays your bills and handles the bank
7 accounts and all that?

8 A I do.

9 Q Okay. So, earlier you said you couldn't remember how much
10 counseling is. Do you not pay that bill?

11 A That's through the insurance.

12 Q Is it your insurance?

13 A Yes.

14 Q You and Jill have your own policy?

15 A Yeah.

16 Q That you pay for?

17 A I believe it's through Medicaid or Medicare.

18 Q Okay. Do you and Jill both have cars?

19 A Yes.

20 Q Do you have a car payment, both of you?

21 A No.

22 Q Do either one of you have a car payment?

23 A No.

24 Q Did someone purchase your cars for you?

25 A No.

1 Q How did you pay for them?

2 A With cash that we had saved up.

3 Q What car do you drive?

4 A A Toyota Camry.

5 Q What year?

6 A 2011.

7 Q What about Jill?

8 A Toyota Highlander.

9 Q What year?

10 A 2010, I believe.

11 Q Okay. Are you -- have you applied for any jobs as an
12 attorney?

13 A I'm not an attorney.

14 Q Right. Have you applied for any jobs to -- that you would
15 hopefully get after you pass the bar?

16 A Yes.

17 Q Where all have you applied?

18 A Over 100. Do you want me to give each one?

19 Q No. Have you gotten any interviews?

20 A Yes.

21 Q Who have you interviewed with?

22 A Federal Judge, Chief Judge, Western Louisiana.

23 Q Would that require a relocation?

24 A Yes.

25 Q Have you gotten any offers for positions?

1 A No.

2 Q So, you have one -- you've had one interview so far?

3 A Post law school, yes.

4 Q Are there any others that you have scheduled?

5 A Not at this time.

6 Q Are you concerned about being able to find a job as an
7 attorney or in the legal field?

8 A I don't know. I'm just doing my best.

9 Q Did you have to take out loans for law school?

10 A No.

11 Q Did -- did you have a scholarship?

12 A Yes.

13 Q Did it pay for all of your expenses and tuition?

14 A No.

15 Q How -- how else was it paid for?

16 A Part-time work, clerkships, things like that.

17 Q Did you receive any financial assistance from any other
18 person or entity?

19 A No.

20 Q Did you have to take out loans for your undergraduate
21 studies?

22 A No.

23 Q How did you pay for undergrad?

24 A Scholarships and working.

25 Q Okay. Earlier when you -- Mr. Owens was asking you

C E R T I F I C A T E

STATE OF ARKANSAS)

) ss

COUNTY OF INDEPENDENCE)

I, STEPHANIE HENDRICKS, Certified Court Reporter #827 and Notary Public, do hereby certify that the facts stated by me in the caption on the foregoing proceedings are true; and that the foregoing proceedings were reported verbatim through the use of the voice-writing method and thereafter transcribed by me or under my direct supervision to the best of my ability, taken at the time and place set out on the caption hereto.

I FURTHER CERTIFY, that I am not a relative or employee of any attorney or employed by the parties hereto, nor financially interested or otherwise, in the outcome of this action, and that I have no contract with the parties, attorneys, or persons with an interest in the action that affects or has a substantial tendency to affect impartiality, that requires me to relinquish control of an original deposition transcript or copies of the transcript before it is certified and delivered to the custodial attorney, or that requires me to provide any service not made available to all parties to the action.

WITNESS MY HAND AND SEAL this 9th day of June, 2021.

STEPHANIE HENDRICKS, CCR, CVR

Certified Court Reporter #827

My Commission Expires: 10/31/30